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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

14 X CORP.,

Case No. 2:24-cv-03162-WBS-CSK

15 Plaintiff,

16 v.
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NOTICE OF RELATED CASES

20 ROBERT A. BONTA, Attorney
21 General of California, in his
22 official capacity, and
23 SHIRLEY N. WEBER, Secretary of
24 State of California, in her
official capacity,

Defendants.

1 Pursuant to Local Rule 123, Plaintiff X Corp. hereby notifies
2 the Court of the following related case: *Rumble Inc. v. Bonta*, No.
3 24-cv-03315-DC-CKD. Plaintiff previously notified the Court of
4 the related cases *Kohls v. Bonta* and *The Babylon Bee, LLC v. Bonta*,
5 consolidated at No. 24-cv-2527-JAM-CKD – see Order Consolidating
6 Cases, No. 24-cv-2527-JAM-CKD, ECF No. 20 (E.D. Cal. Oct. 25, 2024)
7 – that are related both to *X Corp.* and *Rumble Inc.*

8 *X Corp.*, *Rumble Inc.*, *Kohls*, and *The Babylon Bee, LLC* share
9 significant similarities, such that assignment of *X Corp.* and
10 *Rumble Inc.* to Judge John A. Mendez and Magistrate Judge Carolyn
11 K. Delaney would likely affect a substantial savings of judicial
12 effort and is also likely to be convenient for the parties.

13 First, *X Corp.*, *Rumble Inc.*, *Kohls*, and *The Babylon Bee, LLC*
14 involve the same Defendants – Robert A. Bonta and Shirley N. Weber.

15 Second, *X Corp.*, *Rumble Inc.*, *Kohls*, and *The Babylon Bee, LLC*
16 involve similar claims challenging the constitutionality of the
17 same California law, California Assembly Bill ("AB") 2655. Compare
18 Complaint ¶¶ 96-113, 130-145, *X Corp.*, ECF No. 1, with Complaint
19 ¶¶ 109-142, *Rumble Inc.*, ECF No. 1, with Complaint ¶¶ 109-144, 191-
20 194, *Kohls*, ECF No. 1, with Complaint ¶¶ 344-379, *The Babylon Bee,*
21 *LLC*, ECF No. 21.

22 Third, the Court has already found that *The Babylon Bee, LLC*
23 and *Kohls* are "related within the meaning of Local Rule 123." Order
24 Consolidating Cases, No. 24-cv-2527-JAM-CKD, ECF No. 20 (E.D. Cal.

1 Oct. 25, 2024). This led to assignment of *The Babylon Bee, LLC*
2 and *Kohls* to Judge John A. Mendez to effect "a substantial savings
3 of judicial effort" and promote the convenience of the parties."

4 *Id.*

5 *X Corp., Rumble Inc., Kohls,* and *The Babylon Bee, LLC* thus
6 have a significant overlap in questions of fact, law, and requests
7 for relief, and Judge Mendez is already familiar with the legal
8 issues. Therefore, assigning *X Corp.* and *Rumble Inc.* to Judge
9 Mendez will likely save substantial judicial and party resources.

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11 Dated: December 3, 2024

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13 By: /s/ William R. Warne
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PROOF OF SERVICE

I hereby certify that I caused to be filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all attorneys of record in this case. I also certify that I will cause to be emailed the file-stamped copy of the foregoing document to all attorneys of record in *Rumble Inc, et al. v. Bonta et al.*, Case No. 2:24-cv-03315, and to serve all parties in this instant matter.

11 DATED: December 3, 2024

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